

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORTH WORTH DIVISION**

METROPLEX ATHEISTS,  
*Plaintiff,*

v.

CITY OF FORT WORTH,  
DOWNTOWN FORT WORTH, INC.,  
MATTIE PARKER,  
CARLOS FLORES,  
MICHAEL D. CRAIN,  
CHARLES LAUERSDORF,  
GYNA BIVENS,  
JARED WILLIAMS,  
MACY HILL,  
CHRIS NETTLES,  
ELIZABETH M. BECK,  
ALAN BLAYLOCK,  
JEANETTE MARTINEZ,  
DAVID COOKE,  
WILLIAM JOHNSON, *each in their  
individual and official capacities,*  
*Defendants.*

Civil Action No. 4:23-cv-00736-O

**NOTICE OF DISMISSAL WITHOUT PREJUDICE  
AS TO DEFENDANTS PARKER, FLORES, CRAIN, LAUERSDORF,  
BIVENS, WILLIAMS, HILL, NETTLES, BECK, BLAYLOCK,  
MARTINEZ, COOK, AND JOHNSON**

Under Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, FED. R. CIV. P., Plaintiff Metroplex Atheists hereby serves this *Notice of Dismissal Without Prejudice as to Defendants Parker, Flores, Crain, Lauersdorf, Bivens, Williams, Hill, Nettles, Beck, Blaylock, Martinez, Cook, and Johnson*, and would respectfully show the Court as follows:

1. Plaintiff filed suit against Defendant on July 17, 2023 seeking, *inter*

*alia*, injunctive relief.

2. Defendants Parker, Flores, Crain, Lauersdorf, Bivens, Williams, Hill, Nettles, Beck, Blaylock, Martinez, Cook, and Johnson have not been served with process in this Action, and so consequently has not served an answer or motion for summary judgment.

3. The case is not governed by any federal rule or statute that requires leave of the Court prior to dismissal. Further, none of the other conditions set forth in Rule 41 prohibiting voluntary dismissal apply in this Action.

4. Plaintiff accordingly gives notice of dismissal of Defendants Parker, Flores, Crain, Lauersdorf, Bivens, Williams, Hill, Nettles, Beck, Blaylock, Martinez, Cook, and Johnson only from this Action under Rule 41(a)(1)(A)(i). For the avoidance of doubt, this dismissal is without prejudice under FED. R. CIV. P. 41(a)(1)(B).

Dated: July 26, 2023

Respectfully submitted,

**GLAST, PHILLIPS & MURRAY, P.C.**

By: /s/ M.E. Furse

**Matthew E. Furse**

State Bar No. 24105032

MFurse@GPM-Law.com

**Lawrence S. Fischman**

State Bar No. 07044000

LFischman@GPM-Law.com

**Robert N. Loughran**

State Bar No. 24111197

RLoughran@GPM-Law.com

14801 Quorum Dr., Ste. 500

Dallas, Texas 75254-1449

Tel. (972) 419-8300

Fax. (972) 419-8329

*Counsel to Plaintiff,*

**METROPLEX ATHEISTS**

-and-

Geoffrey T. Blackwell (PA 319778)\*  
American Atheists Legal Center  
1517 N. Stillman St., Unit 2  
Philadelphia, PA 19121  
Phone: (908) 603-8787  
gblackwell@atheists.org

\* *Application for pro hac vice admission pending.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2023, a true and correct copy of the foregoing *Notice of Dismissal of Defendants Parker, Flores, Crain, Lauersdorf, Bivens, Williams, Hill, Nettles, Beck, Blaylock, Martinez, Cook, and Johnson* was served electronically via the Court's ECF system upon all parties receiving such notice in this Action.

By: /s/ M.E. Furse  
MATTHEW E. FURSE